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James H.R. Windels

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February 13, 2020

Re: *Celestin, et al. v. Martelly, et al.*
No. 18-cv-7340 (LDH) (PK)

Honorable LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Dear Judge DeArcy Hall:

We are writing on behalf of the Moving Defendants in response to Plaintiffs' letter filed on February 9, 2020. In their letter, Plaintiffs fail to address the crucial issue that the Court may not take judicial notice of the materials Plaintiffs have submitted for the truth of their contents. In any event, nothing in Plaintiffs' materials raises a serious question regarding the adequacy of Haiti as an alternative forum under the *forum non conveniens* standards applied in this Circuit or is relevant to the Moving Defendants' arguments based on the act of state doctrine.

Respectfully yours,

A handwritten signature in blue ink that reads "James H.R. Windels". The signature is stylized, with the first letters of the first and last names being capitalized and prominent.

James H.R. Windels

cc: All counsel of record (by ECF)